Appl. No. 10/076,374
Amendment and/or Response
Reply to Office action of 25 January 2006

Page 6 of 7

## REMARKS / DISCUSSION OF ISSUES

Claims 21-40 are pending in the application. Claims 1-20 are canceled herein, and claims 21-40 are newly added.

The Office action indicates that claims 5, 7-8, 13-16, and 20 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The applicant thanks the Examiner for discerning the distinguishing features of these claims; however, due to the disjoint nature of these claims, an excessive number of resultant independent claims would have been required. The newly added replacement-claims are presented to clearly identify the subject matter that the applicant views as the invention.

In the interest of advancing prosecution, the following remarks are submitted regarding these claims and the prior art of Li (USP 6,275,531) cited in the Office action.

Each of the applicant's independent claims include receiving a plurality of transform blocks in a sequential transform-block order, converting each of the plurality of transform blocks into a plurality of bit-plane encodings, and storing each of the plurality of bit-plane encodings in a sequential bit-plane order of a memory prior to converting another of the plurality of transform blocks.

As the Examiner apparently recognized in allowing former claims 5, 13, and 20, a distinguishing feature of the applicant's invention over Li is the storage of the bit-plane encodings in memory in a bit-plane order. Li teaches storing each encoding of each transform block in sequential order, as each block is processed (Li's FIG. 4), and then reprocessing the entirety of the encodings in the transform-order and extracting the individual bit-planes from each set of encodings to provide the conventional bit-plane-ordered sequential output.

US-020044 Amendment 6.125

Atty. Docket No. US-020044

Appl. No. 10/076,374
Amendment and/or Response
Reply to Office action of 25 January 2006

Page 7 of 7

Because Li does not teach or suggest storing each of the plurality of bit-plane encodings in a sequential bit-plane order of a memory prior to converting another of the plurality of transform blocks, and specifically teaches storing each bit-plane encoding in a sequential transform-order, the applicant respectfully maintains that claims 21-40 are patentable over Li.

In view of the foregoing, the applicant respectfully requests that the Examiner allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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